

STEPHANIE M. HINDS (CABN 154284)
United States Attorney

THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

ADAM A. REEVES (NYBN 2363877)
ROBERT S. LEACH (CABN 196191)
Assistant United States Attorneys

1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3680
Fax: (510) 637-3724
Email: adam.reeves@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. 18-CR-577 CRB
)	
Plaintiff,)	[PROPOSED] ORDER
)	AUTHORIZING RULE 17 SUBPOENAS
v.)	
)	
MICHAEL RICHARD LYNCH and)	
STEPHEN KEITH CHAMBERLAIN,)	
)	
Defendants.)	

FOR GOOD CAUSE SHOWN, after a hearing on this matter conducted on June 3, 2022, the Court hereby **GRANTS** the United States' Motion for Rule 17 Subpoenas dated November 15, 2021 (Document 91), and **ORDERS** the issuance of Rule 17 subpoenas to the following seven (7) persons: (1) Corrado Broli; (2) Nicole Eagan; (3) Lisa Harris; (4) Peter Menell; (5) Poppy Prentiss (aka Poppy Gustafsson); (6) Rob Sass; and (7) Gary Szukalski; the seven subpoenas shall use the form in Exhibits A through G attached hereto; and the subpoenas shall each have a return date of October 5, 2022.

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IT IS SO ORDERED.

DATED:

THE HONORABLE CHARLES R. BREYER
United States District Judge

Exhibit A

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE
DOCUMENTS OR OBJECTS
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Corrado Broli

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE			COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612	17th Fl. Courtroom 6
			DATE AND TIME
			10/5/2022 09:00

☒ You are also commanded to bring with you the following document(s) or object(s):

Please produce all documents relating in any way to Count Seventeen (pages 13-15) of the attached Superseding Indictment in *United States v. Lynch and Chamberlain*, Case No. 18-CR-577 CRB, including all such documents that reference Michael Lynch, Steven Chamberlain, Autonomy, Hewlett Packard ("HP"), Invoke Capital, Darktrace, possible employment, and any other possible benefits.

NOTE: Subpoena forms for the production of documents or objects at or in advance of the trial, hearing or proceeding at which the items are to be offered in evidence (CAND 89B, *Subpoena to Produce Documents or Objects in a Criminal Case*) or for the production of state law enforcement personnel or complaint records (CAND 89C, *Subpoena to Produce State Law Enforcement Personnel Or Complaint Records in a Criminal Case*) are available at the Court's Internet site: cand.uscourts.gov.

U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

06/03/2022

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney
U.S. Attorney's Office
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application
of the United States of America

Stephanie M. Hinds
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
DECLARATION OF SERVER		
I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.		
Executed on _____		
DATE		SIGNATURE OF SERVER
ADDRESS:		
ADDITIONAL INFORMATION		

COUNT SEVENTEEN: (18 U.S.C. § 371 – Conspiracy)

31. The allegations in Paragraphs 1 through 24 are realleged and incorporated as if fully set forth here.

32. Beginning in or about October 2011, and continuing until in or about November 2018, in the Northern District of California and elsewhere, the defendants,

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN,

and others, did knowingly conspire to commit offenses against the United States, namely (a) circumventing a system of internal accounting controls of an issuer of securities registered under Section 12 of the Securities Exchange Act of 1934, in violation of Title 15, United States Code, Section 78m, (b) tampering with witnesses, victims, and informants, in violation of Title 18, United States Code, Section 1512, (c) obstructing proceedings before departments, agencies, and committees, in violation of Title 18, United States Code, Section 1505, and (d) engaging in monetary transactions in property derived from specified unlawful activity, in violation of Title 18, United States Code, Section 1957.

33. The objectives of the conspiracy were, among other things, to cover up, conceal, influence witnesses to, and otherwise obstruct investigations of the scheme to defraud set forth in Paragraphs 19 through 24 by, among other things, (a) falsifying, destroying, and stealing business records of HP, (b) altering, destroying, mutilating, and concealing records, documents, and objects with intent to impair their integrity and availability for use in official proceedings, (c) paying hush money and other benefits to influence, delay, and prevent the testimony of persons in official proceedings, (d) otherwise obstructing, influencing, and impeding official proceedings, and (e) laundering the proceeds of the Autonomy acquisition.

//

Overt Acts

34. In furtherance of the conspiracy and to effect the objects thereof, in the Northern District of California and elsewhere, LYNCH, CHAMBERLAIN, and others committed the following overt acts:

a. On or about October 7, 2011, LYNCH transferred £100,000,000 from an account at UBS to an account at HSBC Private Bank.

b. On or about October 7, 2011, LYNCH transferred £100,000,000 from an account at UBS to an account at Barclay's Private Bank.

c. On or about October 7, 2011, LYNCH transferred £100,000,000 from an account at UBS to an account at JP Morgan International Bank.

d. On or about October 7, 2011, LYNCH transferred £100,000,000 from an account at UBS to an account at Merrill Lynch Portfolio Managers.

e. On or about February 3, 2012, CHAMBERLAIN and Hussain directed an HP finance employee to falsely record approximately \$5.5 million in revenue to be included in HP's financial statements for the period ending January 31, 2012.

f. In or about May 2012, Hussain instructed an HP executive to falsify a revenue forecast.

g. In or about May 2012, a co-conspirator caused the destruction of hard drives in HP's Cambridge office.

h. In or about May 2012, a co-conspirator instructed an HP employee to erase CHAMBERLAIN's laptop computer and any backup.

i. In or about May 2012, a co-conspirator attempted to remove the laptop of another co-conspirator from HP's offices.

j. On or about June 1, 2012, LYNCH transferred £20,000,000 from an account at UBS to an account at Merrill Lynch Portfolio Managers.

k. On or about July 6, 2012, LYNCH caused the incorporation of ICP London Limited ("Invoke") in the British Virgin Islands. LYNCH used Invoke and entities affiliated with Invoke as a means to pay former Autonomy employees, including Hussain.

1 l. On or about July 29, 2012, in an interview with counsel for HP, LYNCH made
2 false and misleading statements to counsel for HP.

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4 records and other property belonging to HP.

5 n. In or about February 2013, a co-conspirator stole HP's confidential information
6 by uploading thousands of documents from her company laptop to a USB device/pen drive, in violation
7 of HP's policies and internal controls. The co-conspirator subsequently provided some or all of the
8 documents to LYNCH and Hussain.

9 o. In or around May 2016, LYNCH caused an Invoke affiliate to hire
10 CHAMBERLAIN.

11 p. On or about February 19, 2018, LYNCH purchased shares of an Invoke affiliate
12 from Hussain for approximately \$3.5 million.

13 q. On or about June 27, 2018, LYNCH purchased shares of an Invoke affiliate from
14 Hussain for approximately \$730,000.

15 In violation of Title 18, United States Code, Section 371.

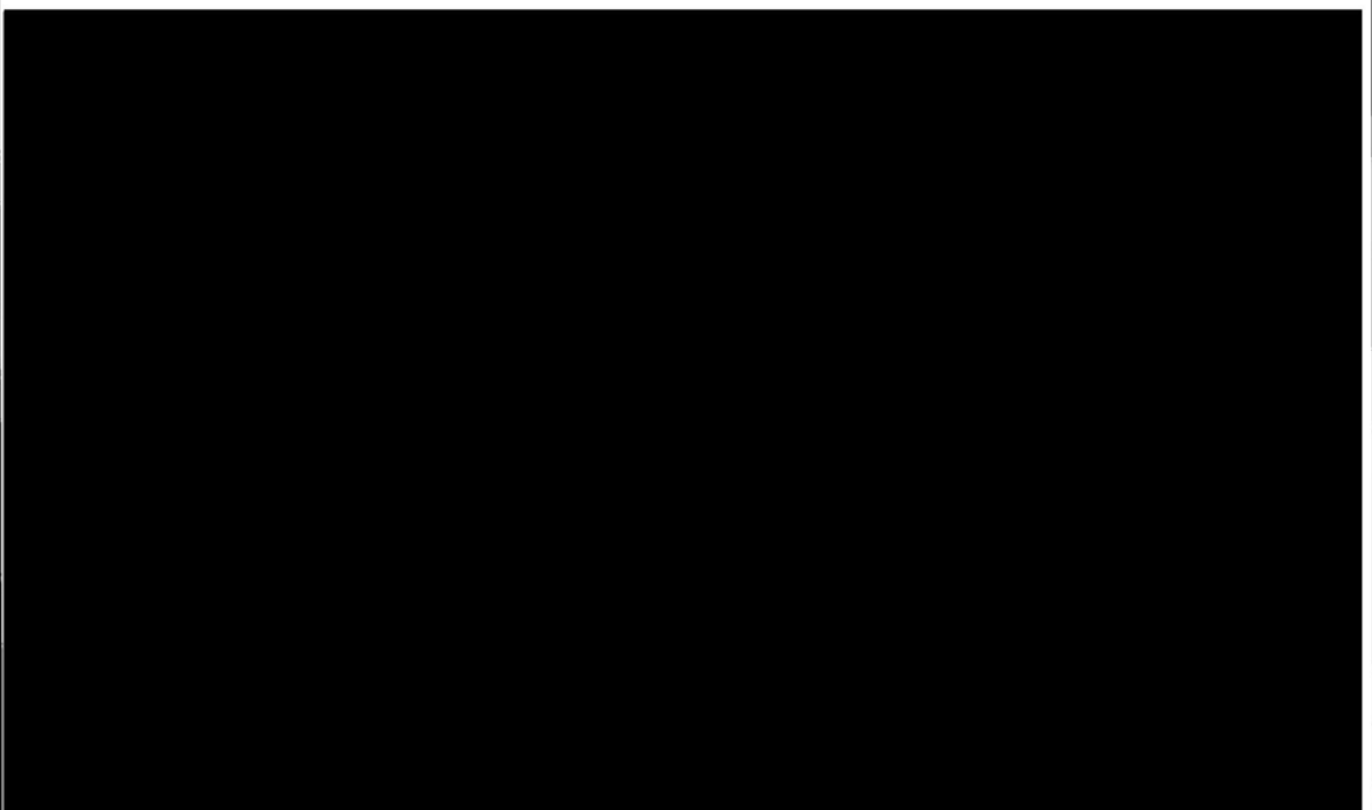


Exhibit B

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE
DOCUMENTS OR OBJECTS
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Nicole Eagan

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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

06/03/2022

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney
U.S. Attorney's Office
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application
of the United States of America

Stephanie M. Hinds
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE

RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$
SERVED BY (PRINT NAME)		TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____

DATE

SIGNATURE OF SERVER

ADDRESS:

ADDITIONAL INFORMATION

1
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6 COUNT SEVENTEEN: (18 U.S.C. § 371 – Conspiracy)

7 31. The allegations in Paragraphs 1 through 24 are realleged and incorporated as if fully set
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13 and others, did knowingly conspire to commit offenses against the United States, namely (a)
14 circumventing a system of internal accounting controls of an issuer of securities registered under Section
15 12 of the Securities Exchange Act of 1934, in violation of Title 15, United States Code, Section 78m, (b)
16 tampering with witnesses, victims, and informants, in violation of Title 18, United States Code, Section
17 1512, (c) obstructing proceedings before departments, agencies, and committees, in violation of Title 18,
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Overt Acts

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h. In or about May 2012, a co-conspirator instructed an HP employee to erase CHAMBERLAIN's laptop computer and any backup.

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j. On or about June 1, 2012, LYNCH transferred £20,000,000 from an account at UBS to an account at Merrill Lynch Portfolio Managers.

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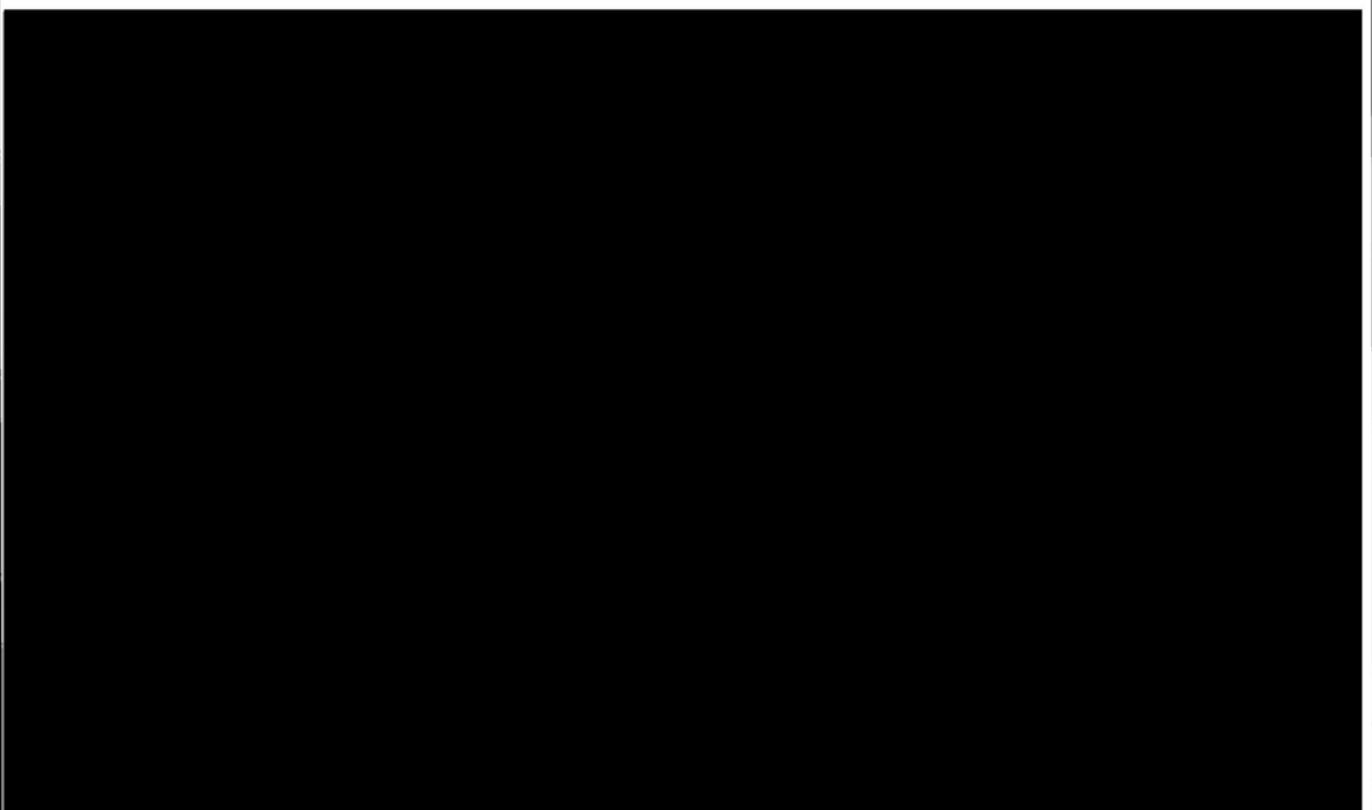


Exhibit C

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE
DOCUMENTS OR OBJECTS
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Lisa Harris

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE			COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612	17th Fl. Courtroom 6
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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

06/03/2022

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney
U.S. Attorney's Office
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application
of the United States of America

Stephanie M. Hinds
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%; text-align: center;">DATE</div> <div style="width: 45%; text-align: center;">SIGNATURE OF SERVER</div> </div> <p style="text-align: center; margin-top: 10px;">ADDRESS:</p>		
ADDITIONAL INFORMATION		

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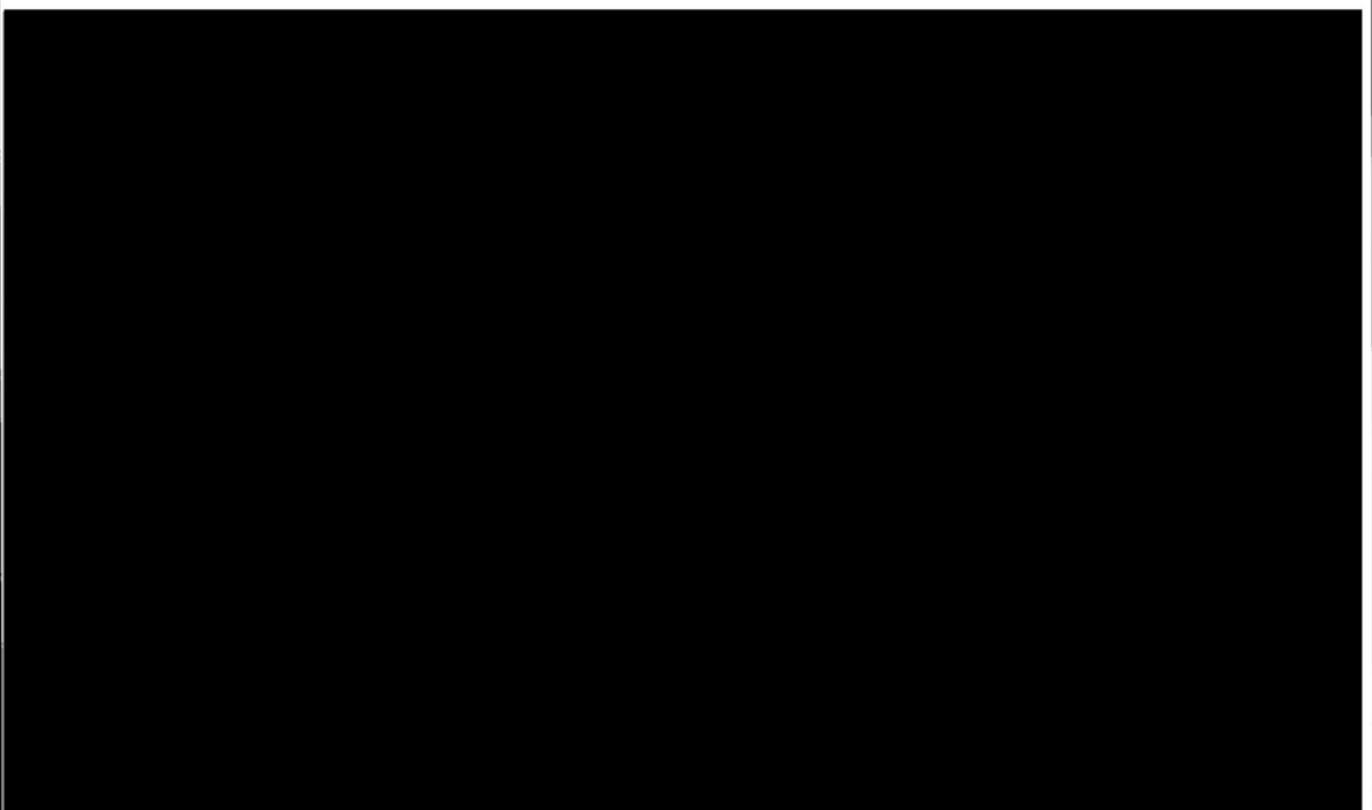


Exhibit D

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE
DOCUMENTS OR OBJECTS
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Peter Menell

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

06/03/2022

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney
U.S. Attorney's Office
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application
of the United States of America

Stephanie M. Hinds
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
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24 intent to impair their integrity and availability for use in official proceedings, (c) paying hush money and
25 other benefits to influence, delay, and prevent the testimony of persons in official proceedings, (d)
26 otherwise obstructing, influencing, and impeding official proceedings, and (e) laundering the proceeds
27 of the Autonomy acquisition.

28 //

Overt Acts

34. In furtherance of the conspiracy and to effect the objects thereof, in the Northern District of California and elsewhere, LYNCH, CHAMBERLAIN, and others committed the following overt acts:

a. On or about October 7, 2011, LYNCH transferred £100,000,000 from an account at UBS to an account at HSBC Private Bank.

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15 In violation of Title 18, United States Code, Section 371.

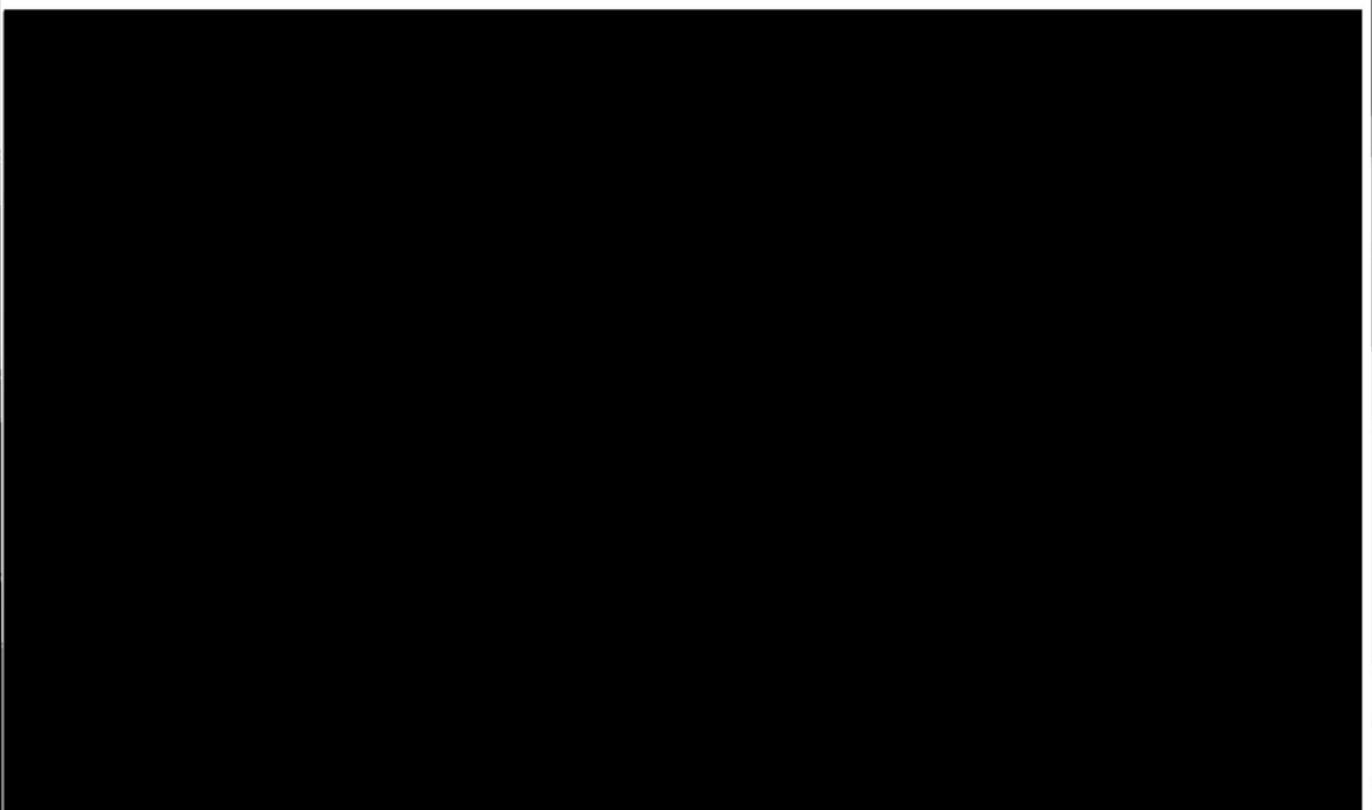


Exhibit E

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE
DOCUMENTS OR OBJECTS
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Poppy Prentiss (aka Poppy Gustafsson)

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE			COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612	17th Fl. Courtroom 6
			DATE AND TIME
			10/5/2022 09:00

☒ You are also commanded to bring with you the following document(s) or object(s):

Please produce all documents relating in any way to Count Seventeen (pages 13-15) of the attached Superseding Indictment in *United States v. Lynch and Chamberlain*, Case No. 18-CR-577 CRB, including all such documents that reference Michael Lynch, Steven Chamberlain, Autonomy, Hewlett Packard ("HP"), Invoke Capital, Darktrace, possible employment, and any other possible benefits.

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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

06/03/2022

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney
U.S. Attorney's Office
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application
of the United States of America

Stephanie M. Hinds
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%; text-align: center;">DATE</div> <div style="width: 45%; text-align: center;">SIGNATURE OF SERVER</div> </div> <p style="text-align: center; margin-top: 10px;">ADDRESS:</p>		
ADDITIONAL INFORMATION		

1
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6 COUNT SEVENTEEN: (18 U.S.C. § 371 – Conspiracy)

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12 STEPHEN KEITH CHAMBERLAIN,

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16 tampering with witnesses, victims, and informants, in violation of Title 18, United States Code, Section
17 1512, (c) obstructing proceedings before departments, agencies, and committees, in violation of Title 18,
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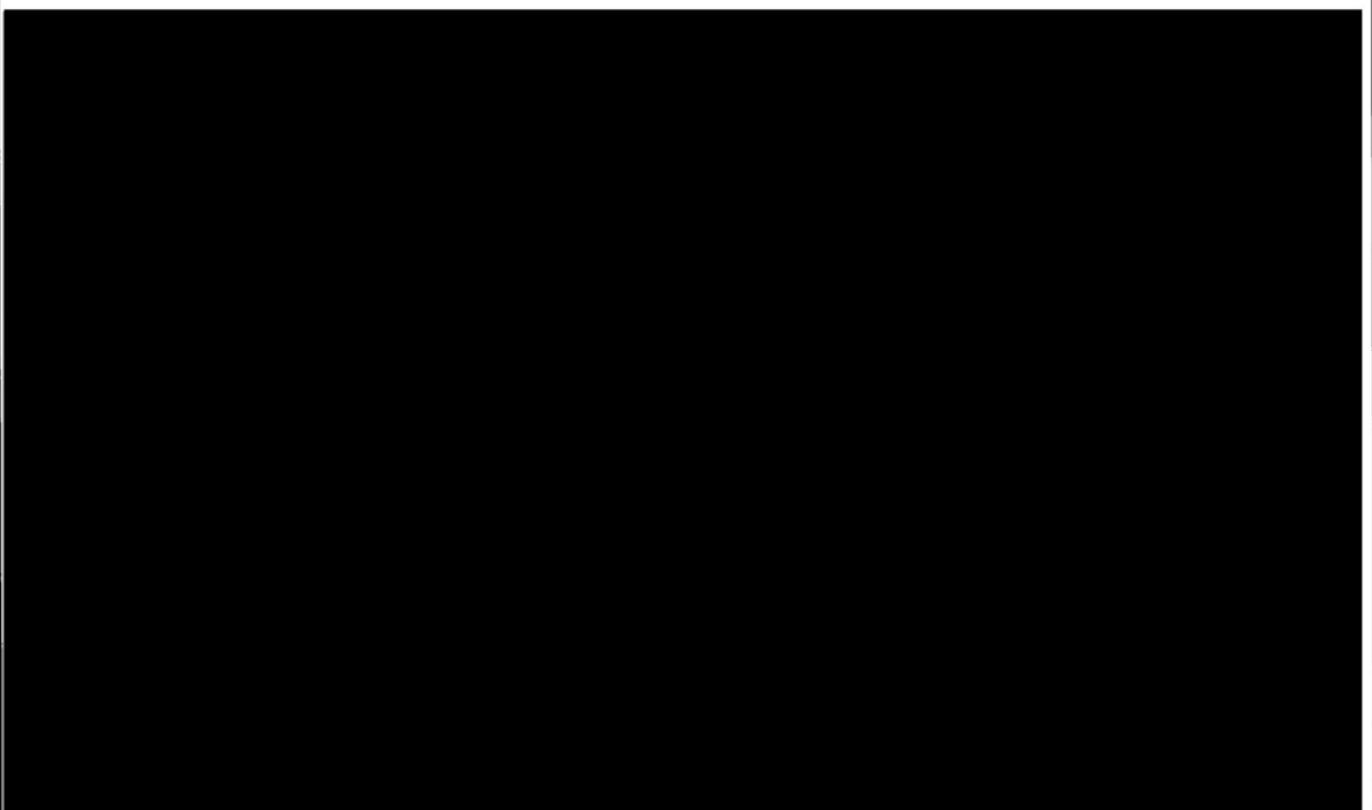


Exhibit F

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE
DOCUMENTS OR OBJECTS
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Rob Sass

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE			COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612	17th Fl. Courtroom 6
			DATE AND TIME
			10/5/2022 09:00

☒ You are also commanded to bring with you the following document(s) or object(s):

Please produce all documents relating in any way to Count Seventeen (pages 13-15) of the attached Superseding Indictment in *United States v. Lynch and Chamberlain*, Case No. 18-CR-577 CRB, including all such documents that reference Michael Lynch, Steven Chamberlain, Autonomy, Hewlett Packard ("HP"), Invoke Capital, Darktrace, possible employment, and any other possible benefits.

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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

06/03/2022

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney
U.S. Attorney's Office
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application
of the United States of America

Stephanie M. Hinds
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%; text-align: center;">DATE</div> <div style="width: 45%; text-align: center;">SIGNATURE OF SERVER</div> </div> <p style="text-align: center; margin-top: 10px;">ADDRESS:</p>		
ADDITIONAL INFORMATION		

1
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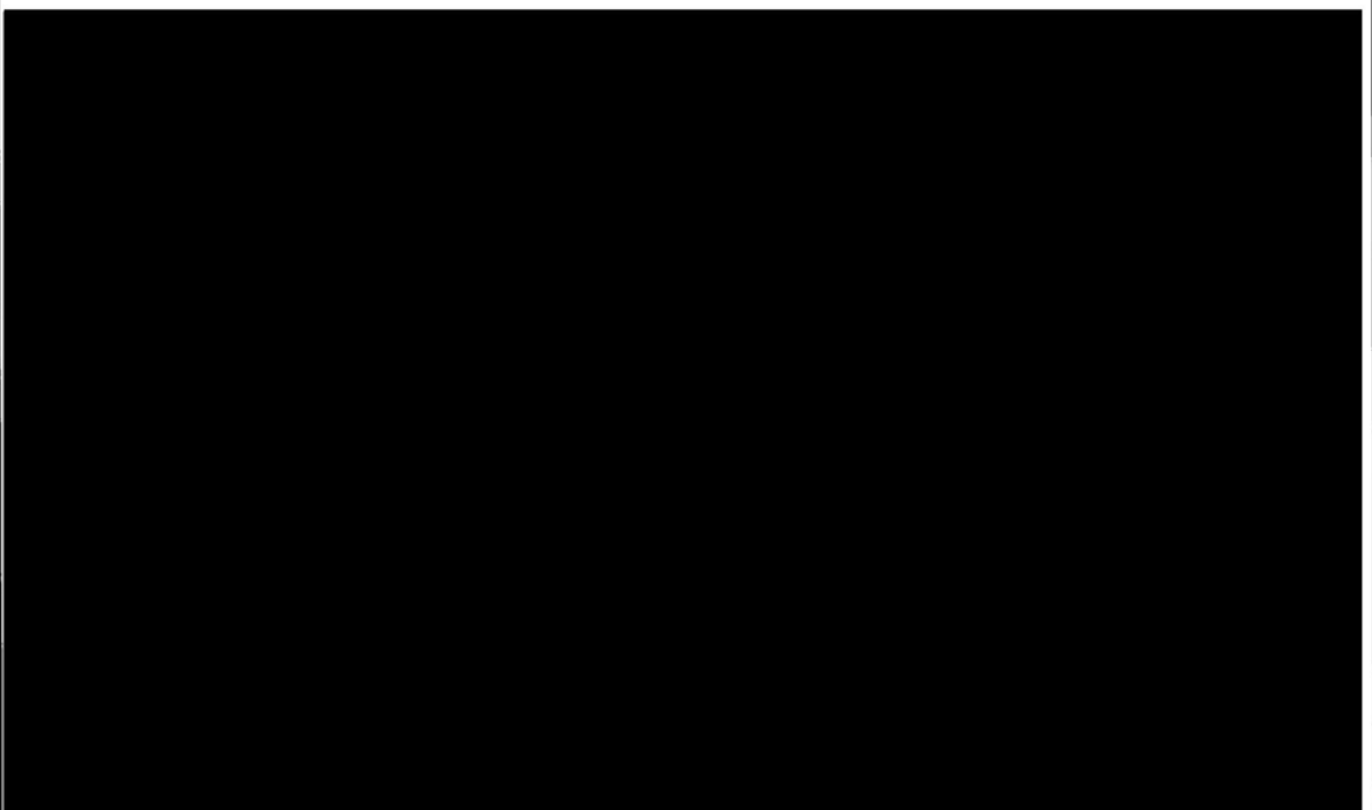


Exhibit G

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL RICHARD LYNCH and
STEPHEN KEITH CHAMBERLAIN.

Defendant(s).

SUBPOENA TO PRODUCE
DOCUMENTS OR OBJECTS
IN A CRIMINAL CASE

Case No.: 3:18-cr-577-CRB

TO: Gary Szukalski

YOU ARE COMMANDED to appear at the place, date, and time specified below, or any subsequent date and time set by the court, to testify in the above-referenced case. This subpoena shall remain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the court.

PLACE			COURTROOM/JUDGE
<input checked="" type="checkbox"/> United States Courthouse 450 Golden Gate Avenue San Francisco, CA 94102	<input type="checkbox"/> United States Courthouse 280 South First Street San Jose, CA 95113	<input type="checkbox"/> United States Courthouse 1301 Clay Street Oakland, CA 94612	17th Fl. Courtroom 6
			DATE AND TIME
			10/5/2022 09:00

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U.S. MAGISTRATE JUDGE OR CLERK OF COURT

DATE

06/03/2022

(By) Deputy Clerk



ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER:

ADAM A. REEVES, Assistant United States Attorney
U.S. Attorney's Office
450 Golden Gate Ave., 11th Fl., San Francisco, CA 94102

Tel. (415) 436-7200

This subpoena is issued on application
of the United States of America

Stephanie M. Hinds
United States Attorney

CAND 89A (Rev. 8/12) Subpoena to Testify in a Criminal Case

PROOF OF SERVICE		
RECEIVED BY SERVER	DATE	PLACE
SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		FEES AND MILEAGE TENDERED TO WITNESS <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$
SERVED BY (PRINT NAME)		TITLE
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.</p> <p>Executed on _____</p> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="width: 45%; text-align: center;">DATE</div> <div style="width: 45%; text-align: center;">SIGNATURE OF SERVER</div> </div> <p style="text-align: center; margin-top: 10px;">ADDRESS:</p>		
ADDITIONAL INFORMATION		

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